

George E. Patterson, Jr. (GP-4783)
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ARGO TURBOSERVE CORPORATION, : 07 CV 8410 (RMB) (GWG)

Plaintiff, : **DECLARATION OF**
 : **GEORGE E. PATTERSON, JR**
- against - : **IN OPPOSITION TO**
 : **DEFENDANTS' MOTION**
DEAN ANGELLE AND DENISE ANGELLE, : **TO COMPEL DISCOVERY**
 : **RESPONSES FROM**
Defendants : **PLAINTIFF**
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GEORGE E. PATTERSON, JR., an attorney duly admitted to practice law in the State of New York, makes the following declaration, pursuant to 28 U.S.C. §1746, under penalty of perjury:

1. I am an associate of Wachtel & Masyr, LLP, attorneys for plaintiff Argo Turboserve Corporation ("ATC"). I am fully conversant with the facts and circumstances set forth herein. This declaration is submitted in opposition to defendants' motion to compel discovery responses from plaintiff.

2. On or about June 14, 2007, I, Steven J. Cohen, and Steve Levy, an investigator retained by Wachtel & Masyr, LLP to investigate potential legal action against the defendants, travelled to the facilities of D&D Pipe & Rentals, Inc. ("D&D Pipe") in Lafayette, Louisiana to meet with several D&D Pipe employees in contemplation of initiating litigation against the defendants arising out of the defendants' sale of D&D Pipe to ATC in 2006.

3. Steve Levy and I interviewed Donald Felix at D&D Pipe's place of business; Mr. Felix identified himself as D&D Pipe's yard supervisor.

4. A few weeks after completing the interview of Mr. Felix, I drafted a declaration for Mr. Felix setting forth statements he made during his interview.

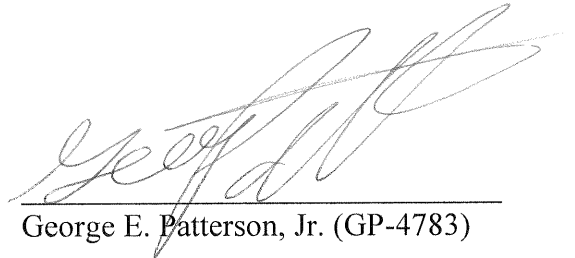
5. In August 2007, the draft declaration was forwarded to Mr. Felix for review.

6. Wachtel & Masyr, LLP subsequently received a signed version of the declaration.

7. At all relevant times, Mr. Felix was an employee of D&D Pipe.

I declare under penalty of perjury that the foregoing is true and accurate.

Executed on April 29, 2008.



George E. Patterson, Jr. (GP-4783)